

**WILMER CUTLER PICKERING  
HALE AND DORR<sup>LLP</sup>**

August 8, 2005

**By E-Mail**

Nancy Freeman Gans, Esq.  
Moulton & Gans, P.C.  
33 Broad Street  
Boston, MA 02109

RECEIVED

AUG 10 2005

Eric D. Levin

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BOSTON, MA 02109  
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Re: Donald Speakman, et al. v. Allmerica Financial Life Insurance and Annuity Co., et al.  
Civil Action No. 4:04-CV-40077-FDS

Dear Nancy:

Enclosed in the above-entitled matter please find the following discovery responses:

1. Defendant Allmerica Financial Life Insurance & Annuity Company's Response to Plaintiffs' First Set of Interrogatories
2. Defendant First Allmerica Financial Life Insurance Company's Response to Plaintiffs' First Set of Interrogatories
3. Defendant Allmerica Financial Corporation's Response to Plaintiffs' First Set of Interrogatories
4. Defendant Allmerica Financial Life Insurance & Annuity Company's Response to Plaintiffs' First Set of Requests for Admissions
5. Defendant First Allmerica Financial Life Insurance Company's Response to Plaintiffs' First Set of Requests for Admissions
6. Defendant Allmerica Financial Corporation's Response to Plaintiffs' First Set of Requests for Admissions

As Rob Biederman and I agreed on August 4, the defendants are providing these written discovery responses subject to plaintiffs' agreement to keep them confidential as "Attorney's Eyes Only" and not to use them for any purpose other than the litigation, until the Court enters a Protective Order in this case.

Enclosed for your review please also find a draft Protective Order.

EXHIBIT

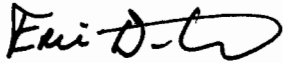
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BALTIMORE BEIJING BERLIN BOSTON BRUSSELS LONDON  
MUNICH NEW YORK NORTHERN VIRGINIA OXFORD WALTHAM WASHINGTON

Nancy Freeman Gans, Esq.  
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Please call me if you have any questions.

Very truly yours, .

A handwritten signature in black ink, appearing to read "Eric D. Levin". The signature is fluid and cursive, with a large loop at the end.

Eric D. Levin

EDL:edl  
Enclosures

cc: Stephen L. Hubbard, Esq. (by e-mail)